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STIP
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No.: 2:14-cr-00103
)	
Plaintiff,)	
)	
vs.)	
)	STIPULATION TO CONTINUE
ASHARON BRAVO,)	CALENDAR CALL AND TRIAL
a.k.a. "Sharon,")	(First Request)
a.k.a. "Shadow,")	
JORGE EDUARDO SANCHEZ-GARCIA,)	
a.k.a. Brandon Isai Gutierrez-Manjarrez,)	
a.k.a. "Guero,")	
a.k.a. "El Moro,")	
TOMAS MARTINEZ-BRAVO)	
a.k.a. "Negro,")	
HECTOR FERNANDO ZAMBRANO-REYES,)	
DAVID RIVERA-SIFUENTES,)	
a.k.a. "Guero,")	
a.k.a. "Guerillo,")	
ISRAEL SOTO-MUNOZ,)	
a.k.a. "Cono,")	
GILBERTO SALAZAR-GARCIA,)	
ESTEBAN SANCHEZ-BILLEGAS,)	
LILIA GUZMAN, and)	
JAVIER LOPEZ-LUCIO)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Daniel G. Bogden, United States Attorney, and Amber M. Craig,

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Assistant United States Attorney, and Defendant, ASHARON BRAVO, by and through her attorneys, Dowon S. Kang, Rsmussen & Kang, Defendant, JORGE EDUARDO SANCHEZ-GARCIA, by and through his attorneys, Gary Modafferi, Turco & Draskovich LLP, Defendant, TOMAS MARTINEZ-BRAVO, by and through his attorney, Michael Ryan Pandullo, Defendant, HECTOR FERNANDO ZAMBRANO-REYES, by and through his attorney, Osvaldo E Fumo, Osvaldo E. Fumo, Chtd, Defendant, DAVID RIVERA-SIFUENTES, by and through his attorney, Jess R. Marchese, Law Office of Jess R. Marchese, Defendant, ISRAEL SOTO-MUNOZ, by and through his attorney, Chris T Rasmussen, Rasmussen & Kang LLC., Defendant, GILBERTO SALAZAR-GARCIA, by and through his attorney, Joel Mann, Law Office of Joel M. Mann, Defendant, ESTEBAN SANCHEZ-VILLEGAS, by and through his attorney, Brian James Smith, Law Office of Brian J. Smith, Ltd., Defendant, LILIA GUZMAN, by and through her attorney, Richard E. Tanasi of Tanasi Law Offices, and Defendant, JAVIER LOPEZ-LUCIO, by and through his attorney, Thomas A. Ericsson, Oronoz & Ericsson, LLP, that the Calendar Call in the above-captioned matter, now scheduled for May 5, 2014, at the hour of 9:00 a.m., be vacated and continued to a date and time convenient to the Court, not less than 120 days from the current setting. The parties also request all related trial deadlines, including but not limited to, pretrial motion deadlines shall also be continued accordingly.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that the Trial in the above-captioned matter, now scheduled for May 12, 2014, at the hour of 9:00 a.m., be vacated and continued to a date and time convenient to the Court, not less than 120 days from the current setting.

This is the first request for a continuance of the Calendar Call and Trial dates.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. A large volume of discovery has recently been made available.
2. Additionally, denial of this request for continuance of trial, calendar call, and pretrial motion deadlines could result in a miscarriage of justice.

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3. For all of the above-stated reasons, the ends of justice would best be served by a continuance of the Calendar Call and Trial dates.

4. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. Section 3161(h)(8)(A), considering the factors under 18 U.S.C. Sections 3161(h)(8)(B)(i) and (iv).

DATED this 22nd day of April, 2014.

DANIEL G. BOGDEN
 United States Attorney

/s/ Amber M. Craig
 AMBER M. CRAIG, ESQ
 Assistant United States Attorney

/s/ Dowon S. Kang
 DOWON S. KANG, ESQ
 Counsel for Defendant
 ASHARON BRAVO

/s/ Gary Modafferi
 GARY MODAFFERI, ESQ
 Counsel for Defendant
 JORGE EDUARDO
 SANCHEZ-GARCIA

/s/ Thomas A. Ericsson
 THOMAS A. ERICSSON, ESQ
 Counsel for Defendant
 JAVIER LOPEZ-LUCIO

/s/ Michael Ryan Pandullo
 MICHAEL RYAN
 PANDULLO, ESQ
 Counsel for Defendant
 TOMAS MARTINEZ-BRAVO

/s/ Osvaldo E. Fumo
 OSVALDO E. FUMO, ESQ
 Counsel for Defendant
 HECTOR FERNANDO
 ZAMBRANO-REYES

/s/ Jess R. Marchese
 JESS R. MARCHESE, ESQ
 Counsel for Defendant
 DAVID RIVERA-SIFUENTES

/s/ Chris T. Rasmussen
 CHRIS T. RASMUSSEN, ESQ
 Counsel for Defendant
 ISRAEL SOTO-MUNOZ

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1 /s/ Joel Mann
2 JOEL MANN, ESQ
3 Counsel for Defendant
4 GILBERTO SALAZAR-GARCIA

/s/ Richard E. Tanasi
RICHARD E. TANASI, ESQ
Counsel for Defendant
LILIA GUZMAN

5 /s/ Brian J. Smith
6 BRIAN J. SMITH, ESQ
7 Counsel for Defendant
8 ESTEBAN SANCHEZ-VILLEGAS

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UNITED STATES DISTRICT COURT

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

ASHARON BRAVO,

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TOMAS MARTINEZ-BRAVO

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HECTOR FERNANDO ZAMBRANO-REYES,

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ISRAEL SOTO-MUNOZ,

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GILBERTO SALAZAR-GARCIA,

ESTEBAN SANCHEZ-BILLEGAS,

LILIA GUZMAN, and

JAVIER LOPEZ-LUCIO

Defendants.

Case No.: 2:14-cr-00103

**FINDINGS OF FACT, CONCLUSIONS
 OF LAW, AND ORDER**

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1 Based upon the pending Stipulation of the parties, and good cause appearing therefore,
2 the Court finds that:

3 A. The parties have stipulated to continue the calendar call and trial dates as presently
4 scheduled.

5 B. This Court, being convinced that adequate showing has been made that were this
6 request for continuance to be denied, counsel would not have the necessary time to effectively
7 prepare for trial, taking into account the exercise of due diligence, and a miscarriage of justice
8 could result, based on the following:

9 1. A large volume of discovery has recently been made available.

10 2. Additionally, denial of this request for continuance could result in a miscarriage of
11 justice.

12 3. For all of the above-stated reasons, the ends of justice would best be served by a
13 continuance of the Calendar Call, Trial dates, and pretrial motion deadlines.

14 4. The additional time requested by this Stipulation is excludable in computing the time
15 within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C.
16 Section 3161(h)(8)(A), considering the factors under 18 U.S.C. Sections 3161(h)(8)(B)(i) and
17 (iv).

18
19 **ORDER**

20 IT IS HEREBY ORDERED that the Calendar Call currently scheduled for May 5, 2014,
21 at the hour of 9:00 a.m., be vacated and continued to 10/14/14 , at the
22 hour of 9:00 a. .m.; and

23 IT IS FURTHER ORDERED that the Trial currently scheduled May 12, 2014, at the
24 hour of 9:00 a.m., be vacated and continued to 10/20/14 , at the hour of
25 8:30 a. .m.

26 **DATED** this 23rd day of April, 2014.

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Gloria M. Navarro, Chief Judge
United States District Court